

Juneau Audubon Society PO Box 21725 Juneau, AK 99802

8/22/2004

NE NPR-A Amendment Planning Team Bureau of Land Management (930) Alaska State Office 222 West 7<sup>th</sup> Ave. Anchorage, AK 99513-7599

Re: Teshekpuk Lake in the National Petroleum Reserve-Alaska

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Juneau Audubon Society urges you to adopt Alternative "A"-the "No Action" Alternative- to retain current protections for the critical fish and wildlife habitats around Teshekpuk Lake. When this area is protected, it provides wildlife habitat for molting geese from three nations, nesting birds from six continents, and caribou used for subsistence by Alaskan communities.

002 Caribou Juneau Audubon supports environmentally safe natural resource exploration and extraction. We do not support decreasing the protected area of critical habitat around Teshekpuk Lake. Along with important goose-molting habitat, the Teshekpuk Lake Surface Protection Area provides the most concentrated caribou calving and insect relief areas.

003 Special Designation The US Fish and Wildlife Survey conducts annual surveys of the Teshekpuk Lake Surface Protection Area. The surveys of molting geese in the Teshekpuk Lake area document a 15-year mean of 17,570 black brant, 13,001 Canada geese, 7,024 greater white-fronted geese, and 232 lesser snow geese. Total average goose usage for the 199 lake areas surveyed is 37,827 annually. This data highlights the importance of the area not only locally, but globally. Other species that regularly nest in the Teshekpuk Lake area include Northern pintail, long-tailed duck, scaup, scoter, and eider as well as greater white-fronted geese, tundra swan, and loons. Significant populations of these species habitually use the NPR-A and the Northeast Planning area. This habitat is well identified and its integrity should be preserved for continued use by all migratory birds.

004 Birds Studies have documented a higher sensitivity to disturbance for brant during molt, and for caribou during the calving season. Due to this sensitivity, allowing any activity in the north and east portions of the Teshekpuk Lake Surface Protection Area could result in impacts altering the present use of the area by waterfowl and other wildlife species. Sensitive goose molting area should not be offered for lease; it should not be open to

construction of roads, pipelines, or other intrusive facilities; and seasonal human activity should be restricted.

005 Global Warming Global warming is being felt in the arctic environment right now. The additional impact of industrial oil development could have major consequences for Teshekpuk Lake wildlife. Now more than ever before, we need to have areas unaffected by human activity. Climate changes are occurring more rapidly in the arctic than anywhere else. The continued existence of untouched refuges may help increase wildlife and ecosystem adaptability to the many unforeseen changes the future may bring.

Brenda Wright, president Juneau Audubon